

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



Office of Pesticide Programs

MEMORANDUM

9/19/2018

SUBJECT: Product Chemistry Review for *Cousteau W.*,
EPA Reg. No.: 777-RGG, DP 447160

FROM: Salvador Rodriguez, chemist
Product Science Branch, CT Team
Antimicrobials Division (7510P)

THRU: Karen Hicks, Team Leader
Product Science Branch
Antimicrobials Division (7510P)

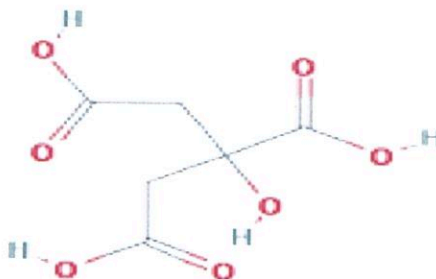
LB for KPH

TO: Jacqueline Hardy, PM Team 34 / Stacey Grigsby
Regulatory Management Branch select
Antimicrobials Division (7510P)

Registrant: Reckitt
Benckiser LLC.
Action code: A540
Agency Due Date:
10/15/2018
Science Due Date 9/15/18
Submission No.: 1018862
E-Sub No.: 28614
Classification: EP
Process: Nonintegrated
system
Pesticide classification:
Antimicrobial, disinfectant
& sanitizer.

Formulation from label

PC code(s)	CAS #(s)	Active Ingredient(s)	% weight
021801	77-92-9	Citric acid	2.63



I. BACKGROUND

The Registrant, Reckitt Benckiser LLC., has submitted an application for pesticide registration for their product: ***Cousteau W.*** EPA Reg. No. 777-RGG.

II. RELEVANT DOCUMENTS

	RECEIVED	N/A
EPA FORM 8570-1 – Application for Pesticide Registration	<input checked="" type="checkbox"/>	<input type="checkbox"/>
EPA FORM 8570-27 – Formulator’s Exemption Statement	<input type="checkbox"/>	<input checked="" type="checkbox"/>
EPA FORM 8570-34 – Certification with respect to citation of data	<input type="checkbox"/>	<input checked="" type="checkbox"/>
EPA FORM 8570-35 – Data Matrix (5/1/2018)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Cover letter (4/20/2018)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Transmittal document	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Proposed CSF BASIC, and ALTERNATE #: (1) dated (4/20/2018)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Proposed label, (4/20/2018)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Certification for Pilot Fragrance Notification Program	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<input type="checkbox"/>	<input checked="" type="checkbox"/>
REFERENCED CSF: N/A	--	
Comments:		

III. FINDINGS

CONFIDENTIAL STATEMENT OF FORMULA

a. Product Formulation:

	TGAI	MUP	<i>EUP</i>	Food use	<i>Non-food use</i>
Non-integrated	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>Integrated</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Active Ingredients(s)			Nominal	Upper limit	Lower limit
Citric acid			2.63	2.80	2.50

	Acceptable	Not Acceptable	N/A
1. The certified limits of all ingredients are within 40 CFR standard certified limits.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Wider certified limits were requested and rationale was accepted.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. The nominal concentration(s) of the active ingredient is in agreement with the label.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. The chemical IDs and analytical information for density, pH, and flammability are consistent with Series 830 Group B data.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. All inert ingredients are approved for non-food use pesticide formulations.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. The impurities present >0.1% are identified.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Impurities of toxicological significance have an upper certified limit.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

b. Product Label:

	Yes	NO	N/A
<i>The formula contains one of the following:</i>			
1. 10% or more of petroleum distillate	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. 1.0% or more of methyl alcohol	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Sodium nitrite at any level	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. A toxic list 1 inert at any level	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Arsenic in any form	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. If yes to 2-6, then the inert ingredient list contains a relevant footnote	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7. Appropriate warning statements regarding flammability or explosive characteristics of the product are included on the label	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. The storage and disposal instructions for the pesticide container are in compliance with PR Notice 84-1 for household use products or PR Notice 83-3 for all other uses.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. The product requires an expiration date at which time the nominal concentration falls below the lower certified limit.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

IV. Additional Findings: None

V. Conclusion:

Product Science Branch of Antimicrobials Division finds the proposed OPPTS Guideline Series 830 Groups A & B and the Confidential Statement of Formula, dated 4/20/18, for the basic and alternate #: (1) formulations, supporting the disinfectant, sanitizer & antimicrobial, non-integrated, non-food use, end-use product **777-RGG** to be **acceptable**.

**VI. Table A:
Series 830 guidelines – Group A**

OPPTS#	Name	Status	MRID
830.1550	Product Identity & Composition	Acceptable	50530201 50530204
830.1600	Description of materials	Acceptable	50530201
830.1620	Description of production process	Not required	N/A
830.1650	Description of formulation process	Acceptable	50530201
830.1670	Discussion of formation of impurities	Acceptable	50530201
830.1700	Preliminary analysis	This requirement is not applicable on the basis that the product is neither produced by an integrated system nor does it consist solely of the technical grade active ingredient.	N/A
830.1750	Certified limits	Acceptable	50530201
830.1800	Enforcement analytical method	Acceptable	50530204 50530205 50530207
830.1900	Submittal of samples	Not required	N/A

**VII. Table B:
Series 830 guidelines – Group B**

OPPTS#	Name	Study Findings/Comment	Status	MRID
830.6302	Color	Lovibond color # <1	Acceptable	50530202 50530203
830.6303	Physical state	Liquid	Acceptable	50530202
830.6304	Odor	Fragrance	Acceptable	50530202
830.6313	Stability to normal & elevated temperatures, metals & metal ions	The product is not TGAI	Not applicable	N/A
830.6314	Oxidation/Reduction	No changes witnessed when adding water, monoammonium phosphate, turpentine, zinc, or KMnO ₄	Acceptable	50530202
830.6315	Flammability	Product is not potentially flammable	Acceptable	50530202

830.6316	Explodability	Product does not contain explosive ingredients	Acceptable	50530202
830.6317	Storage stability	Product is stable	Acceptable	50530208 50530202
830.6319	Miscibility	Product not mixed with organic solvents	Acceptable	50530202
830.6320	Corrosion characteristics	Container stable	Acceptable	50530208 50530202
830.6321	Dielectric breakdown voltage	Product not used near electrical equipment	Acceptable	50530202
830.7000	pH	2.23	Acceptable	50530202
830.7050	UV/Visible absorption	The product is not TGAI	Not applicable	N/A
830.7100	Dynamic Viscosity	1.158 centipoise	Acceptable	50530202
830.7200	Melting point	Not required for MUP or EP	Not applicable	N/A
830.7220	Boiling point	The product is not TGAI	Not applicable	N/A
830.7300	Density/relative	1.0077 g/mL	Acceptable	50530202
830.7370	Dissociation constants in water	The product is not TGAI	Not applicable	N/A
830.7520	Particle size	The product is not TGAI	Acceptable	50530202
830.7550/ 7560/ 7570	Partition coefficient	The product is not TGAI	Not applicable	N/A
830.7840/ 7860	Water solubility	The product is not TGAI	Not applicable	N/A
830.7950	Vapor pressure	The product is not TGAI	Not applicable	N/A